

EPA Comments on the September 3 version of the Busseron TMDL, submitted to IDEM
10/3/08

1. The TMDL Report (or appendix) should describe the differences between the various types of mines discussed in the TMDL Report.
 2. Section 3.2, page 16 top: Appendix H is supposed to have additional info on the TP target. However, the info in Appendix H is very brief, and discusses the Al and Fe WQSSs.
 3. Section 3.2, page 16 first full paragraph: It would be helpful to clarify that Al has a greater impact on cold-water species. Thus, the “removal” of these species from the criteria derivation results in a higher criteria number. The report also discusses taking into consideration “acceptable data”. This should be clarified (is this referring to the addition of the amphibian data?) or at least referenced to the criteria appendix. Note that the Al criteria used in the last sentence appears to be wrong (should this be 987?).
 4. Section 6.2: some of these segments are missing from Table 2. For example, Sulpher Creek Station 1 (INB11G4_T1004) is not on Table 2. Sulpher Creek Station 2 on page 34 should be on T1005A. Sulpher Creek Station 3 on page 36 should be on T1005B.
 5. 6.2.4: Should the reference to total zinc be dropped, since there is no load to total zinc in this segment? Or is this an “in general, pH addressed by metals “ situation?
 6. Section 6.2.5: Suggest adding: “A tributary to Big Branch (segment INB11G5_00) was also identified as impaired due to total aluminum and biotic communities, **and is addressed in this loading calculation.** The TMDL is summarized in Table 26. “
- This section states there are four NPDES facilities, but gives only three sites. Looks like AML Site 9321 should be added.
7. Section 6.2.6: Table 1 has this segment as “Busseron Creek – Hymera”
 8. Section 6.2.7: Suggest adding discussion on how the WLAs for Dugger were calculated. Summer concentration used for dry/low flows, winter concentrations used for high/moist/mid.
 9. Section 6.2.8: Table 2 shows this segment as _01. Also, looks like a typo in the WLA sentence.
 10. Table 2: Should Station 1 and station 13 be in this table?